

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO. 20210607 – INP000700 – D
DATE OF NOTICE: JUNE 7, 2021
DATE RESPONSE DUE: JULY 8, 2021

The Office of Water Quality proposes the following NPDES DRAFT PERMIT:

PRETREATMENT – MODIFICATION

VOESTALPINE BOHLER WELDING USA TECHNOLOGY LLC, Permit No. INP000700, PORTER COUNTY, 6797 Fronius Drive, Portage, IN. This modification request is to correct permit limits due to EPA inspection findings. Permit Manager: Taylor Wissel, 317/234-4260, twissel@idem.in.gov. Posted online at <https://www.in.gov/idem/6408.htm>.

PROCEDURES TO FILE A RESPONSE

Draft can be viewed or copied (10¢ per page) at IDEM/OWQ NPDES PS, 100 North Senate Avenue, (Rm 1203) Indianapolis, IN, 46204 (east end elevators) from 9 – 4, Mon - Fri, (except state holidays). A copy of the Draft Permit is on file at the local County Health Department. Please tell others you think would be interested in this matter. For your rights & responsibilities see: Public Participation Guide: <http://www.in.gov/idem/5474.htm> or Citizens' Guide to IDEM: <https://www.in.gov/idem/6900.htm>.

Response Comments: The proposed decision to issue a permit is tentative. Interested persons are invited to submit written comments on the Draft permit. All comments must be postmarked no later than the Response Date noted to be considered in the decision to issue a Final permit. Deliver or mail all requests or comments to the attention of the Permit Writer at the above address, (mail code 65-42 PS).

To Request a Public Hearing:

Any person may request a Public Hearing. A written request must be submitted to the above address on or before the Response Date noted. The written request shall include: the name and address of the person making the request, the interest of the person making the request, persons represented by the person making the request, the reason for the request and the issues proposed for consideration at the Hearing. IDEM will determine whether to hold a Public Hearing based on the comments and the rationale for the request. Public Notice of such a Hearing will be published in at least one newspaper in the geographical area of the discharge and sent to anyone submitting written comments and/or making such request and whose name is on the mailing list at least 30 days prior to the Hearing.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

June 7, 2021

VIA ELECTRONIC MAIL

Mr. Alexander Wipplinger, Managing Director
voestalpine Bohler Welding USA Technology LLC
6797 Fronius Drive, Suite B
Portage, Indiana 46368

Dear Mr. Wipplinger:

Re: IWP Permit No. INP000700
Draft Permit Modification
voestalpine Bohler Welding USA Technology LLC
Portage, IN – Porter County

A permit modification has been reviewed and processed in accordance with rules adopted under 327 IAC 5. The enclosed permit pages are intended to replace the corresponding pages in the existing IWP Permit No. INP000700. An accompanying Briefing Memo itemizes and explains the rationale for the revisions.

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/idem/5474.htm>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/6900.htm>. A 30-day comment period is available to solicit input from interested parties, including the public.

Please review this draft permit modification and associated documents carefully to become familiar with the proposed terms and conditions. Comments concerning the draft permit modification should be submitted in accordance with the procedure outlined in the enclosed public notice form. We suggest that you meet with us to discuss major concerns or objections you may have with the draft permit modification.



Mr. Alexander Wipplinger, Managing Director
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Questions concerning this draft permit modification may be addressed to Taylor Wissel of my staff, at 317/234-4260 or by email at twissel@idem.in.gov.

Sincerely,

A handwritten signature in black ink that reads "Nikki Gardner". The script is cursive and fluid.

Nikki Gardner, Chief
Industrial NPDES Permits Section
Office of Water Quality

Enclosures

cc: Porter County Health Department
Tracie Marshall, Portage POTW
David Littleton, voestalpine Bohler Welding USA Technology LLC
Leigh Voss, IDEM
Nick Ream, IDEM

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AMENDED AUTHORIZATION TO DISCHARGE UNDER THE
INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM

INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

In accordance with 327 IAC 5-21 and IDEM's permitting authority under IC 13-15, **voestalpine Bohler Welding USA Technology LLC** (hereinafter referred to as the permittee) is authorized to discharge, from the facility located at 6797 Fronius Drive, Portage, Indiana into the **Portage Publicly Owned Treatment Works (POTW)**, in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

The permit, as issued on December 11, 2019, is hereby amended, as contained herein. The amended provisions shall become effective _____. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the amendments will remain in effect until the amended provisions become effective. This permit and the authorization to discharge, as amended, shall expire at midnight December 31, 2024.

NOTE: In order to receive authorization to discharge beyond the date of expiration, the permittee must submit a renewal IWP permit application to the Industrial NPDES Permit Section in the Office of Water Quality, no later than one hundred and eighty (180) days prior to the date this permit expires. Failure to do so will result in expiration of the authorization to discharge.

Signed on _____ for the Indiana Department of
Environmental Management.

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

PART I

(A) EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(1) During the period beginning on the effective date of this permit, the permittee is authorized to discharge from Outfall 001[1][2]. Outfall 001 is located after treatment of process wastewater but prior to combination with non-contact cooling water and sanitary wastewaters. Such discharge shall be limited and monitored by the permittee as specified below:

Table 1

<u>Parameter</u> [3]	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Daily Maximum</u>	<u>Monthly Average</u>		<u>Measurement Frequency</u> [5]	<u>Sample Type</u> [4]
Flow [6]	Report	Report	MGD	Daily	24-Hr. Total
Cadmium	0.11 [8]	0.07 [8]	mg/l	2 X Week	Grab
T. Chromium	2.77 [8]	1.71 [8]	mg/l	2 X Week	Grab
Copper	3.38 [8]	2.07 [8]	mg/l	2 X Week	Grab
Lead	0.69 [8]	0.43 [8]	mg/l	2 X Week	Grab
Nickel	3.98 [8]	2.38 [8]	mg/l	2 X Week	Grab
Silver	0.43 [8]	0.24 [8]	mg/l	2 X Week	Grab
Zinc	2.61 [8]	1.48 [8]	mg/l	2 X Week	Grab
T. Cyanide [10]	1.20 [8]	0.65 [8]	mg/l	2 X Week	Grab
TTO [11]	2.13 [8]	-----	mg/l	2 X Year	Grab
Phosphorus	10 [9]	-----	mg/l	2 X Week	Grab

Table 2

<u>Parameter</u>	<u>Daily Minimum</u>	<u>Daily Maximum</u>	<u>Unit</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
pH [7]	5.5 [9]	9.5 [9]	s.u.	Daily	Grab

[1] Outfall 001 shall be designated as process wastewaters and contains no dilution streams.

[2] The discharge shall not exceed the local limits in the Sewer Use Ordinance upon entering the POTW.

[3] All metals shall be analyzed as Total Recoverable Metals.



Industrial Wastewater Pretreatment (IWP)
Briefing Memo for
voestalpine Bohler Welding USA Technology LLC
Draft modification: June 2021

Indiana Department of Environmental Management
 100 North Senate Avenue
 Indianapolis, Indiana 46204
 (317) 232-8603
 Toll Free (800) 451-6027
www.idem.IN.gov

Permittee:	voestalpine Bohler Welding USA Technology LLC 6797 Fronius Drive, Suite B Portage, Indiana 46368
Existing Permit Information:	Permit Number: INP000700 Expiration Date: December 31, 2024
Facility Contact:	David Littleton, WWT Supervisor (219) 617-4407 or david.littleton@voestalpine.com
Facility Location:	6797 Fronius Drive, Suite B Portage, Indiana 46368 Porter County
Receiving POTW:	Portage WWTP NPDES Permit No. IN0024368
Proposed Permit Action:	Modify
Source Category	Industrial Pretreatment
Permit Writer:	Taylor Wissel, Senior Environmental Manager (317) 234-4260 or twissel@idem.in.gov

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1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) proposes to modify voestalpine Bohler Welding USA Technology LLC's Industrial Wastewater Pretreatment (IWP) Permit INP000700. The current five-year permit was issued with an effective date of January 1, 2020 in accordance with 327 IAC 5-2-6(a).

In accordance with Title 40 of the Code of Federal Regulations (CFR) Sections 124.7 and 124.56, as well as Indiana Administrative Code (IAC) 327 Article 5, development of a Statement of Basis, or Briefing Memo, is required for NPDES permits. This document fulfills the requirements established in those regulations.

This Briefing Memo identifies the basis for this modification to the permit and the modified pages of the permit issued on December 11, 2019.

2.0 PERMIT MODIFICATION

2.1 Modification Request

On March 25, 2021, voestalpine Bohler Welding USA Technology LLC was inspected by U.S. Environmental Protection Agency (USEPA) Region 5 staff. USEPA staff noted in their inspection report that there were discrepancies between the IWP permit and facility operations. The IWP permit issued in 2019 uses the Combined Wastestream Formula (CWF) to develop effluent limitations due to process wastewater combining with non-contact cooling water and sanitary wastewater prior to being sampled and discharged through Outfall 001; however, the inspection conducted by USEPA states that process wastewater is sampled prior to combination with any other flows. The inspection report notes that:

“A pipe that discharges non-contact cooling water connects to the process wastewater discharge pipe, a point beyond the sample point. Also, sanitary sewage is discharged separately—it does not combine with the process wastewater discharge before the sample point.”

Pursuant to 327 IAC 5-2-16(a), IDEM is taking action to modify IWP permit No. INP000700 to correct the discrepancies discovered by USEPA during their inspection in March. IDEM has followed up with the facility to confirm that the sampling will occur after treatment of process wastewater, but before combination with non-contact cooling water and sanitary wastewater. This modification will address the changes to effluent limitations as a result of the sampling location.

2.2 IDEM's Proposed Modification

To correct the discrepancies identified by USEPA, IDEM is proposing to modify the IWP permit to remove the effluent limitations derived by use of the Combined Wastestream Formula (CWF) and establish the applicable effluent limitations in 40 CFR 433.17, as well as any applicable local limits.

Local limits in the City of Portage's Sewer Use Ordinance were included in the 2019 permit; however, the permittee is sampling after process but prior to combination with non-process wastewaters so local limits would not be applicable to Outfall 001. The 2019 permit included local limits for CBOD₅, ammonia (as N), and phosphorus at the request of the City of Portage. This modification proposes to remove the effluent limitations for CBOD₅ and ammonia (as N). IDEM is proposing to retain the local limit for phosphorus of 10 mg/l at Outfall 001 due to the nature of the discharge, use of phosphorus-containing chemicals in the process, and previous effluent limit violations for phosphorus.

2.3 Discharge Description

The permittee discharges wastewaters from the following sources to the POTW:

<u>Source</u>	<u>Flow (GPD)</u>
Process Wastestream #1:	8000 (1)
Sanitary:	1500
Non-contact Cooling Water:	500

- (1) Process Wastestream #1 is wastewater from the cleaning, electroplating, and rinse tanks. The wastewater is treated and sampled prior to combination with non-contact cooling water and sanitary wastewaters.

3.0 PERMIT LIMITATIONS

3.1 Summary of Limits and Basis for Each:

Outfall 001

The table below summarizes the permit limits at the sample site designated Outfall 001[1][2]. Outfall 001 is located after treatment of process wastewater and prior to combination with non-contact cooling and sanitary wastewaters.

Table 1

<u>Parameter [3]</u>	<u>Discharge Limitations</u>		<u>Units</u>	<u>Monitoring Requirements</u>	
	Daily <u>Maximum</u>	Monthly <u>Average</u>		Measurement <u>Frequency [5]</u>	Sample <u>Type [4]</u>
Flow [6]	Report	Report	MGD	Daily	24-Hr. Total
Cadmium	0.11 [8]	0.07 [8]	mg/l	2 X Weekly	Grab
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Cyanide [10]	1.20 [8]	0.65 [8]	mg/l	2 X Weekly	Grab
TTO [11]	2.13 [8]	-----	mg/l	2 X Yearly	Grab
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Table 2

<u>Parameter</u>	Daily <u>Minimum</u>	Daily <u>Maximum</u>	<u>Units</u>	Measurement <u>Frequency</u>	Sample <u>Type</u>
pH [7]	5.5 [9]	9.5 [9]	s.u.	Daily	Grab

- [1] Outfall 001 shall be designated as process wastewaters and contains no dilution streams.
- [2] The discharge shall not exceed the local limits in the Sewer Use Ordinance upon entering the POTW.
- [3] All metals shall be analyzed as Total Recoverable Metals.
- [4] Grab samples will be allowed in lieu of 24-Hour Composites due to the brief nature of the discharge.
- [5] Parameters that are to be monitored twice per year shall be reported during the months of June and December. If, however, two other months are more appropriate, the permittee may request to report in two alternate months, or the State may require the permittee to report during two alternate months.

In situations of intermittent or batch discharge, all parameters required to be monitored should be sampled during the first representative discharge occurring during the monitoring period and then reported on the appropriate state and federal forms at the end of the monitoring period.

If a representative discharge occurs at any time during the monitoring period as identified for that individual parameter, then it is a violation of this permit to not collect a sample and report those results. At the first opportunity that a representative discharge occurs during the monitoring period, it should be sampled for all the required parameters during that monitoring period. Waiting to collect a sample until the end of a monitoring period risks missing a representative sample collection opportunity, and it is considered a violation of this permit to not collect a sample, analyze and report those results, when there was a discharge for that monitoring period.

- [6] The flow must be measured and recorded using valid flow measurement devices, not estimated. The flow monitoring device must be calibrated at least once every twelve (12) months.
- [7] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.
- [8] Based on categorical standards [40 CFR 433.17]. The Standard is concentration-based (mg/l).
- [9] Based on local ordinance [Portage Ordinance No. 09-17 (adopted 4/8/2009)].
- [10] The CN(T) parameter includes all cyanide, chelated (bound to heavy metals) and unchelated (free). The Metal Finishing Standard for CN(T) applies only to the CN-bearing flows prior to mixing with the non-CN Metal Finishing flows.
- [11] The Total Toxic Organics (TTO) parameter is defined as the sum of all the quantifiable concentration values above .01 mg/l for the toxic organic compounds that constitute this parameter under the applicable categorical standard.

3.2 Permit Processing/Public Comment

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/idem/5474.htm>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/6900.htm>. A 30-day comment period is available to solicit input from interested parties, including the public.